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March 13, 2018

The Honorable Richard J. Sullivan

United States District Judge

United States District Court

Southern District of New York

Thurgood Marshall United States Courthouse

40 Foley Square, Room 2104

New York, New York 10007

**conveyed via Electronic Transmission*

Re: *Katherine Townsend Griffin, et.al. v. Edward Christopher Sheeran, et.al.; Case Number: 1:17-CV-05221 (RJS)*

Dear Judge Sullivan:

Our law firm represents the Plaintiffs, Katherine Townsend Griffin, Helen McDonald, and the Estate of Cherrigale Townsend, in connection with the above-styled litigation. Pryor Cashman, LLP represents all of the Defendants, Edward Christopher Sheeran, Sony/ATV, and Atlantic Records in this case. We jointly submit this letter with counsel(s) for the Defendants in accordance with Your Honor's Individual Rule 1(C) to request an extension of the existing fact discovery schedule, currently set to conclude on March 15, 2018, until March 28, 2018.

To date, the Parties have been diligently engaged in discovery. Plaintiffs have taken the depositions of Mr. Sheeran and a representative of Sony/ATV, and they have provided over 100 pages of responsive documents. Defendants have appeared for the aforementioned depositions, and they have produced close to 2000 pages of responsive documents, with additional documents to be produced

imminently. However, notwithstanding their diligent efforts to date, and owing to the schedules of the parties and counsel (Ms. Griffin has been out of the country for the better part of the last month to the birth of her grandchild), the parties require a brief extension of time—13 days—to complete fact discovery, until March 28, 2018. To that end, Ms. Griffin and Ms. McDonald have agreed to appear for their depositions on March 23, 2018, and the parties are working to confirm the deposition of a representative of Atlantic for the same date.

Thus, the respective parties herein, respectfully, request the extension of fact discovery, until March 28, 2018

Under the new schedule, as contemporaneously proposed, it is not believed that it will be necessary for any other aspect of the discovery and/or trial schedule to be changed or altered.

This is the first time that the parties herein have requested any adjournment or extension of time.

Respectfully Submitted:

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